

## **REMARKS**

In the Office Action dated April 6, 2004, claims 1, 2, 6, 9, 10, 12, 13 and 14 were rejected under 35 U.S.C. §103(a) as being unpatentable over Talmadge '138 in view of Eckert. Claim 6 was rejected under 35 U.S.C. §103(a) as being unpatentable over this combination, further in view of Windel. Claims 3, 4, 5 and 11 were rejected under 35 U.S.C. §103(a) as being unpatentable over the first combination, further in view of Gilham. Claims 7 and 8 were rejected under 35 U.S.C. §103(a) over the first combination, further in view of Cordery.

These rejections are respectfully traversed for the following reasons.

At page 3 of the Office Action, the Examiner cited several passages from the Talmadge '138 reference as, according to the Examiner, providing a teaching corresponding to the claim language stating that the security module data processing unit is programmed to "immediately upon receipt of said new system data, validates said new system data and determine whether said new system data are required for said security code and, if so, to immediately begin recalculating said security code in a first routine and, in a second routine, to finish recalculating said security code for at least one security imprint, thereby producing a recalculated security code, and to initiate an accounting operation for said monetary value and to communicate the recalculated security code to said separate data processing unit." In addition to Figures 1-6 and 11 of the Talmadge '138 reference, the Examiner cited column 2, lines 62-68; column 3, lines 1-32; column 5, lines 5-14; column 8, lines 21-47 and column 18, lines 1-55 in the Talmadge '138 reference as providing such a teaching. Applicants have carefully reviewed each of these passages, but find no teaching in any of those passages which describes the aforementioned operation of the security

module data processing unit as explicitly set forth in the language of claim 1 of the present application.

As Applicants have previously argued, the present Applicants have recognized, in view of recently enacted U.S.P.S. requirements for generating a security code for each piece of mail processed by a postage meter, that the security module represents a processing bottleneck. This is because, as also previously argued, the security module must be physically protected, such as by encapsulation, and thus the physical size of the security module is limited to a size that can be appropriately encapsulated. This, in turn, limits the physical size of the processor and the memory capacity that can be contained in such a security module, thereby also limiting the overall processing capability within the security module.

As also previously argued, Applicants have had the insight to recognize that by separating out certain processing tasks that have conventionally performed by the security module, but which are not specifically related to the processing of security data, and by performing these non-security-relevant processing tasks in a separate processor, the security module can be relieved of those tasks and thus represents less of a bottleneck. As Applicants have continuously argued, however, their insight has not been “merely” to divide these processing tasks. The aforementioned specific language in claim 1 is an example of how, in addition to this separation of processing steps, the inventors have designed the security module processor to operate in a manner that even further alleviates the aforementioned bottleneck. The Talmadge ‘138 reference discloses a vault that the Examiner is equating with a security module, however, this vault has a ROM for electronic indicia for a value printing system. The reason why this ROM is present in the vault disclosed in the Talmadge ‘138 reference is because the vault in that reference is still responsible for generating

a pattern for a security imprint. This is the type of calculation which, in the subject matter disclosed and claimed in the present application, is no longer performed by the security module. In the subject matter disclosed and claimed in the present application, the security module is only responsible for making the necessary calculations to generate the security code, but the actual image compilation is undertaken by the aforementioned separate processor, outside of the security module. The Talmadge '138 reference does disclose a printing system based on two separate modules, one of which is responsible for maintaining a secure record, while the other of which is responsible for printing. Nevertheless, the Talmadge '138 reference does not provide any teachings whatsoever regarding the particular processing details within the vault, and clearly does not provide any teaching that corresponds to the above-cited explicit language in claim 1 of the present application.

The aforementioned processing that is explicitly set forth in claim 1 is inextricably associated with the aforementioned divisions of processing tasks because it is by first separating out these processing tasks that the aforementioned specific type of processing that occurs in the security module is beneficial. As noted above, separating the processing tasks between two different units (the security module data processing unit and the separate data processing unit) only reduces the processing time to a certain extent. There is still the problem that the one task that the security module must undertake requires a fixed time to generate the security code for each request. The aforementioned processing that occurs as a result of the security module data processing unit being programmed by the first program minimizes the response time of the security module for certain input requests. When large numbers of substantially identical (i.e. size and weight) postal items are being

processed, the present inventors have recognized that, from item-to-item, the same security code will be applicable, and need not be separately calculated anew for each such substantially identical item. Thus, in the subject matter of claim 1, the security module data processing unit determines whether new system data are required for the security code and, if so, it immediately begins recalculating the security code in a first routine. The security module data processing unit does so, while in a second routine, finishing recalculating the security code for at least one security imprint. If no new system data are determined to be present by the security module data processing unit, no recalculation is necessary, and thus the processing time for a substantially identical postal items is significantly improved.

Usually such new system data will be manually entered, such as when a user wishes to frank a postal item of a particular size and weight. In the case of bulk mailings, however, when all of the postal items are of substantially the same size and weight, considerable timesavings are achieved.

The Examiner relied on the Eckert reference as teachings steps involved in the generation of the security code that is passed to the secondary processor to generate the postage value imprint. The Examiner cited text at column 2, lines 1-68 in the Eckert reference as providing such a teaching, however, this passage merely refers to a generation of a single digit encrypted number, which clearly is not suitable for use as, and is not the same as, a security code. The Eckert reference teaches a method and apparatus for verifying postage, wherein a postal official or clerk uses a decoder to decode data on a postal item, for deriving the aforementioned single digit encrypted number therefrom. Such a single digit encrypted number, however, is not unique to the postal item itself, and therefore is not the same as a security code. Applicants fail to even see the purpose for embodying teachings relating to such a

decoder, as taught in the Eckert reference, to the franking system disclosed in Talmadge '138. Certainly, a person of ordinary skill in the field of postage meter design, without having had the benefit of first reading Applicants' disclosure, would find no linking between these two different types of devices.

More importantly, however, the aforementioned manner of operation described in the Eckert reference does not even remotely suggest the specific processing that takes place in the method of claim 1, by virtue of the security module data processing unit being programmed by the first program. Therefore, even if the Talmadge '138 system were modified in accordance with the teachings of Eckert, the resulting combination still would not perform the method of claim 1. The subject matter of claim 1, therefore, would not have been obvious to a person of ordinary skill in the field of postage meter design based on the teachings of Talmadge '138 and Eckert.

As to independent claim 9, Applicants submit that neither the Talmadge '138 nor the Eckert reference discloses or suggests presetting all system data required for calculating the security code and, upon receipt of new system data requiring recalculation of the security code, immediately validating the new system data and recalculating the security code using the new system data, as explicitly set forth in claim 9.

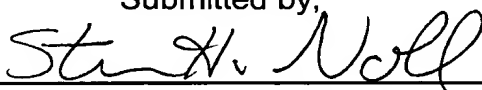
The claims depending from independent claims 1 and 9 add further steps to the non-obvious method in each of those claims, and therefore would not have been obvious to a person of ordinary skill in the field of postage meter design for the same reasons discussed above in connection with the independent claims.

Since the basic combination of the teachings of Talmadge '138 and Eckert was used as the basis for all of the further rejections, involving one or more

secondary references, Applicants submit that for the reasons discussed above even if this basic combination were modified in accordance with the teachings of one or more of the secondary references, the subject matter of the various dependent claims still would not result, since each of those dependent claims embodies the subject matter of either claim 1 or 9 therein. Since the Talmadge '138/Eckert combination fails to teach the subject matter of either of independent claims 1 and 9, modifying that combination in view of the teachings of any of the secondary references still would not result in the claimed combinations of the respective dependent claims. Individual discussion of the respective secondary references is therefore not seen to be necessary.

For the above reasons, all claims of the application are submitted to be in condition for allowance, and early reconsideration of the application is respectfully requested.

Submitted by,



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